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Hon. Anne Y. Shields, U.S.M.J. United States District Court, E.D.N.Y. 100 Federal Plaza, P.O. Box 830 Central Islip, New York 11722

Re: Unique Importer and Distributer v. Sterling Seafood Corp., et al. Civil Case No. 19-cv-3883

Dear Judge Shields:

We have been engaged to represent defendant Sterling Seafood Corp. ("Sterling") in the above-referenced matter. Pursuant to Your Honor's Individual Practice Rules we write to request a 30 day extension to file an answer or otherwise move in this case. Sterling was served on July 30, 2019, such that its answer is presently due on August 20, 2019. Sterling has not made any prior requests for an extension. Plaintiff's counsel has not returned a telephone call and email requesting consent for the extension. However, Sterling does not wish to run afoul of Part III of Your Honor's Individual Practice Rules, which require that this request be made 48 hours prior to the presently scheduled deadline. If granted, defendant Sterling's answer would now be due on September 19, 2019. Should the Court have any questions about this request, please do not hesitate to contact me.

Respectfully submitted,

s/ Michael J. Cohen

Michael J. Cohen

MJC/ft

cc: All counsel of record (Via ECF)